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Attorneys for Defendants
NEXGEN HEALTHCARE, INC. and ROMUALDO
GERONIMO

FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

EVELYN EDRA,

Plaintiff,

v.

NEXGEN HEALTHCARE, INC., THE
TERRACES OF LOS GATOS, and
ROMUALDO GERONIMO

Defendants.

Civil Action No. CV13-0227 RMW

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO
CONTINUE ADR DEADLINE**

Pursuant to USDC Local Civil Rules 6-2 and 7-12, Plaintiff Evelyn Edra and Defendants NexGen Healthcare, Inc., Romualdo Geronimo and American Baptist Homes of the West, dba The Terraces of Los Gatos, ("the Parties") hereby stipulate and agree as follows:

WHEREAS the Parties agreed to complete an Early Neutral Evaluation as a form of Alternative Dispute Resolution ("ADR") process;

WHEREAS the Parties were ordered by the Court to complete an Early Neutral Evaluation by July 17, 2013;

WHEREAS the Parties have an Early Neutral Evaluation scheduled for July 16, 2013, with briefs to be submitted by July 8, 2013;

WHEREAS the Parties are currently actively engaged in settlement communications and would like to continue to pursue such negotiations without spending the time and resources to prepare for the currently scheduled July 16, 2013 Early Neutral Evaluation;

WHEREAS the Parties are currently in the process of exchanging documents in order to assist in their settlement discussions; and

WHEREAS the extension of the ADR deadline will not impact any other currently scheduled deadlines.

NOW THEREFORE, the Parties, by and through their undersigned counsel, hereby stipulate and agree as follows:

The Parties hereby jointly request that the Court postpone the Parties deadline for completing ADR/Early Neutral Evaluation for 45 days, from July 17, 2013 until August 31, 2013.

IT IS SO STIPULATED.

Dated: June 25, 2013

JONES DAY

By: 
Allison B. Moser

Attorneys for Defendants
NexGen Healthcare, Inc. and Romualdo
Geronimo

1 Dated: June ____, 2013

VAN DERMYDEN ALLISON LAW
CORPORATION

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3
4 By: _____
Alexander M. Sperry

5 Attorneys for Defendant
6 American Baptist Homes of the West, dba
The Terraces of Los Gatos

7 Dated: June ____, 2013

ROBERT DAVID BAKER, INC.

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9
10 By: _____
11 Robert David Baker

12 Attorney for Plaintiff Evelyn Edra

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14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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16 Date: _____

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18 _____
19 Honorable Ronald M. Whyte
20 United States District Judge

1 Dated: June __, 2013

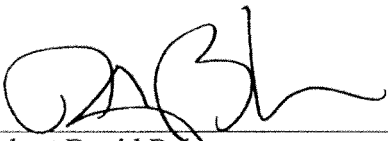
VAN DERMYDEN ALLISON LAW
CORPORATION

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4 By: _____
Alexander M. Sperry

5 Attorneys for Defendant
6 American Baptist Homes of the West, dba
The Terraces of Los Gatos

7 Dated: June ²⁵__, 2013

8 ROBERT DAVID BAKER, INC.

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11 By:  _____
Robert David Baker

12 Attorney for Plaintiff Evelyn Edra

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14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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16 Date: _____

17
18 _____
19 Honorable Ronald M. Whyte
20 United States District Judge

1 Dated: June 24, 2013

VAN DERMYDEN ALLISON LAW
CORPORATION

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3
4 By: 

Alexander M. Sperry

5 Attorneys for Defendant
6 American Baptist Homes of the West, dba
The Terraces of Los Gatos

7 Dated: June ____, 2013

8 ROBERT DAVID BAKER, INC.

9
10
11 By: _____

Robert David Baker

12 Attorney for Plaintiff Evelyn Edra

13
14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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16 Date: i DEH

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19 Honorable Ronald M. Whyte
20 United States District Judge